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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91201920
Party	Defendant Citiair, LLC
Correspondence Address	MATTHEW H SWYERS THE TRADEMARK COMPANY 344 MAPLE AVE W STE 151 VIENNA, VA 22180-5612 UNITED STATES mswyers@thetrademarkcompany.com
Submission	Answer
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Signature	/Matthew H. Swyers/
Date	12/14/2011
Attachments	ANSWER AND GROUNDS OF DEFENSE TO AMENDED NOTICE OF OPPOSITION.pdf (4 pages)(22270 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board

Serial No. 85/219,849,
For the mark CITIAIR and design,

Citigroup, Inc.,

Opposer,

vs.

Citair, LLC,

Applicant.

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Opposition No. 91201920

ANSWER AND GROUNDS OF DEFENSE TO AMMENDED NOTICE OF OPPOSITION

COMES NOW the Applicant, Citair, LLC (hereinafter “Applicant”), by and through counsel, The Trademark Company, PLLC, and files its Answer and Grounds of Defense to the Notice of Opposition and in response to Opposer’s allegations states as follows:

ANSWER

Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in the Introductory Paragraph of the Notice of Opposition and therefore denies the same. In response to the specifically enumerated paragraphs of the Notice of Opposition, Applicant responds as follows:

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 1 of the Notice of Opposition and therefore denies the same.
2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 2 of the Notice of Opposition and therefore denies the same.

3. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 3 of the Notice of Opposition and therefore denies the same.

4. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 4 of the Notice of Opposition and therefore denies the same.

5. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 5 of the Notice of Opposition and therefore denies the same.

6. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 6 of the Notice of Opposition and therefore denies the same.

7. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 7 of the Notice of Opposition and therefore denies the same.

8. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 8 of the Notice of Opposition and therefore denies the same.

9. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 9 of the Notice of Opposition and therefore denies the same.

10. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 10 of the Notice of Opposition and therefore denies the same.

11. Applicant denies the allegations set forth in Paragraph 11 of the Notice of Opposition and demands strict proof thereof.

12. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 12 of the Notice of Opposition and therefore denies the same.

13. Applicant denies the allegations set forth in Paragraph 13 of the Notice of Opposition and demands strict proof thereof.

14. Applicant denies the allegations set forth in Paragraph 14 of the Notice of Opposition and demands strict proof thereof.

15. Applicant denies the allegations set forth in Paragraph 15 of the Notice of Opposition and demands strict proof thereof.

16. Applicant denies the allegations set forth in Paragraph 16 of the Notice of Opposition and demands strict proof thereof.

Applicant further denies all allegations not specifically, actually or constructively, admitted in the foregoing paragraphs of this Answer and Grounds of Defense.

WHEREFORE, Applicant prays that the Notice of Opposition be dismissed.

Respectfully submitted this 14th day of December, 2011.

THE TRADEMARK COMPANY, PLLC

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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board**

Serial No. 85/219,849,
For the mark CITIAIR and design,

Citigroup, Inc.,

Opposer,

vs.

Citair, LLC,

Applicant.

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Opposition No. 91201920

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of the foregoing this 14th day of December,
2011, to be served, via first class mail, postage prepaid, upon:

Kenneth Plevan, Esq.
Skadden, Arps, Slate, Meagher & Flom, LLP
Four Times Square
New York, NY 10036

/Matthew H. Swyers/
Matthew H. Swyers